

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)	
)	
National Translator Association Petition)	RM-10666
For Rule Making to Establish a Rural)	
Translator Service)	

COMMENTS OF KUED/UNIVERSITY OF UTAH

The University of Utah strongly supports the efforts of the National Translator Association (NTA) in securing a Rural Translator Service. As the largest licensee of existing translators in the state of Utah, our mission cannot be accomplished without service to rural areas.

Order is needed in the application process. As has been mentioned by other commentaries and in the original filing, the commission has been overwhelmed by the flood of applications from entrepreneurs and speculators, due to the limited number of translator application windows. The proposal submitted by the NTA includes several guidelines that will help prevent that from happening in the future. While we agree with all of their suggestions, we specifically applaud the requirement that a definition of “rural area” include any area that does not receive four (4) or more grade B signals over the air from a primary station.

Translators serve the citizens of rural communities. In addition to supplying a variety of entertainment, this nation’s translator service provides essential and timely information to the people of rural America. Within the State of Utah, the translator system serves as the official “State Relay” for providing Emergency Alerts to the rural areas. This system, as mandated by Congress and the FCC, provides messages of national security from the White House, critical weather and other life protecting alerts, and more recently, “Amber

Alerts” notifying citizens of specific, time critical, child abductions. This system has never been used more effectively than it was on May 7th when a child abduction in Minnesota was broadcast over the Amber Alert system resulting in an arrest in rural Utah that same evening. This incident marks the third time an Amber Alert was issued in Utah. In both of the other instances, both children have been found, and in one instance, 5 hours after the alert was issued.¹

The proposed Rule Making will aid the transition to DTV. It is imperative that new FCC rules and regulations be quickly forthcoming that include digital television for TV translators. It is also evident; if the commission develops only one set of rules to include TV Translators, On-Channel Boosters, Low Power TV stations and Class A LPTV stations, the final time of rule completion will take years, resulting, again, in a flood of applications will take years longer to resolve. The NTA’s suggestions contained within this proposed Rule Making will facilitate DTV service to rural America by providing a defined service and specific guidelines for the submission of applications.

While there are some who would use the translator license as a method of financial gain, the NTA proposal provides the FCC with an orderly, reasonable method for providing television service to Rural America.

Respectfully Submitted,

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¹ The first time was June 5, 2002 when Elizabeth Smart was abducted from her home at knifepoint. Acting on a tip from citizens, police found her in the company of two religious zealots nine months later. The second time was on January 29th, 2003, when a 3-month-old was taken from a mall. He was found the next day, five hours after the alert went out.